

Frequently Asked Question about Utah's Archaeological Survey Permitting System

Q#1 – I have a Utah State Antiquities Permit issued by the Division of State History. When do I need to get a new Archaeological Survey Permit?

A – Applicants do not need to obtain a new Utah Archaeological Survey Permit until the Antiquities Permit they are working under expires. All existing State Antiquities Permits expire on June 30, 2007. Note that permit requirements have changed and possession of an Antiquities Permit does not guarantee that an applicant will be granted an Archaeological Survey Permit.

Q#2 – Who is permitted under the new system?

A – Under the new permitting rules, the Public Lands Policy Coordination Office (PLPCO) permits individual Principal Investigators (PIs), not companies or agencies. Field Supervisors or Directors no longer require a permit, but must work under the supervision and direction of a permitted PI. Field Supervisors or Directors may apply for an Archaeological Survey Permit, but requirements are applicable to PIs, and an individual should not assume that a permit will automatically be granted simply because they currently possess a permit from the Division of State History.

Q#3 – Have the requirements for obtaining an Archaeological Survey Permit changed?

A – Yes, to obtain an Archaeological Survey Permit, an applicant must have: (1) a graduate degree in Anthropology, Archaeology, or History; (2) one year of full-time professional experience or equivalent specialized training in archaeological research, administration, or management; and (3) one year of supervised field and analytical experience in Utah prehistoric or historic archaeology.

Q#4 – Can an applicant obtain a permit without a graduate degree?

A – Yes, but only under limited circumstances. In lieu of a graduate degree, an individual may submit evidence demonstrating the ability to design and execute a research project in anthropology, archaeology, or history, including the collection and analysis of information, presentation of results in an approved and reviewed format, and the subsequent curation of specimens.

Q#5 – What evidence of the ability to design and execute a research project is required to fulfill the in-lieu-of a graduate degree criteria?

A – First, a satisfactory research project must demonstrate application of proper scientific methods, including but not limited to formulation of a research question that advances knowledge of history or pre-history and application of appropriate methods to address the research question. In general, Class III survey reports are insufficient to meet this requirement

because determining National Register eligibility does not involve a satisfactory research question.

Second, the applicant must demonstrate execution of the research project utilizing appropriate scientific methods.

Third, the applicant must demonstrate appropriate collection and curation of data suitable for addressing the research question.

Fourth, the applicant must demonstrate use of appropriate analytical techniques (e.g. chemical or physical analysis, statistical methods, etc.) to address the research question.

Fifth, the applicant must present results in a clear, understandable format that advances knowledge of history or pre-history.

Q#6 – Can an applicant substitute training for the required one year of full-time professional experience?

A – Yes, an applicant may submit evidence of training related to proper methodologies for field procedures, laboratory analysis, and reporting in lieu of professional experience. The applicant must demonstrate that the training was of a sufficient scope and duration to substitute for a full year of full-time professional experience.

Q#7 – Can work outside the State of Utah, but within the general physiographic and cultural regions found in Utah be substituted for one year of supervised field and analytical experience in Utah prehistoric or historic archaeology?

A – Yes. Where an applicant wishes to substitute work experience from outside the State of Utah, the applicant bears the burden of demonstrating that their experience involves the same cultures and resources likely to be encountered in Utah. Generally, work experience within the Great Basin or Colorado Plateau satisfies this requirement. Work experience in the High Plains, Northern Great Plains, or Wyoming Basin is generally not sufficient to satisfy this requirement.

Q#8 – Is accreditation by the Register of Professional Archaeologists required to obtain an Archaeological Survey Permit?

A – No, accreditation by the Register of Professional Archaeologists (RPA) is no longer required. However, permit holders must comply with the Code of Conduct and Standards of Research Performance promulgated by the RPA. A copy of this Code and Standards can be found on the Archaeological Permitting section of the Public Lands Policy Coordination Office (PLPCO) webpage. If an individual fails to comply with all laws, rules, and permit conditions -- including compliance with the RPA Code of Conduct and Standards of Research Performance -- their permit may be amended, suspended or revoked.

Q#9 – Does the PI need to be in the field at all times during fieldwork?

A – No, PIs are responsible for the quality of fieldwork completed on projects they supervise and are expected to take an active role in fieldwork. The PI must insure that persons performing or supervising work are fully qualified to perform such work and that these individuals comply with the RPA Code and Standards.

Q#10 – Do PIs acquire project and site numbers from the PLPCO instead of the Utah Division of State History?

A – No, PIs will continue to obtain project and site numbers from the Utah Division of State History.

Q#11 – Do I have to provide PLPCO with a copy of their Curation Agreement?

A – Yes, PIs should continue to renew their Curation Agreement as needed and are responsible for ensuring that a copy of a valid agreement is on file with PLPCO. Since Curation Agreements expire at the end of each calendar year and permits are valid for three years, PI are responsible for sending PLPCO an updated agreement at the end of the calendar year. A valid Curation Agreement must allow for curation of all artifacts found within areas in which the PI proposes to work. Individuals working for the same employer or agency may be permitted with the same Curation Agreement.

Q#12 – How long will it take for me to receive my permit after I have applied?

A – PLPCO will make every effort to review complete applications within 30 days of receipt. More time may be needed if additional information is needed to evaluate an applicant's qualifications. Some applications may be reviewed by outside permitted PIs.

Q#13 – How long are the new Archaeological Permits good for?

A – Archaeological Survey Permits are valid for three years from the date the permit is issued. Archaeological Excavation Permits shall be effective for the amount of time reasonably necessary to complete the research design's excavation, laboratory analysis, reporting and curation. Principal Investigators are asked to estimate this time frame on their Excavation Permit application.

Q#16 – Does an Archaeological Survey Permit allow me to conduct excavations?

A – No. You must obtain an Excavation Permit before excavating archaeological resources. Contact PLPCO for more information on obtaining an Archaeological Survey Permit.

Q#17 – When conducting an archaeological survey, some minor ground disturbance may be needed to determine if a site is potentially eligible for listing on the National Register of Historic Places. How much ground disturbance is allowed under a survey permit?

A – Surveys are defined by law as a "surface investigation for archaeological resources that may include: (a) insubstantial surface collection of archaeological resources; and (b) limited subsurface testing that disturbs no more of a site than is necessary to determine the nature and extent of the archaeological resources or whether the site is a historic property." Utah Code § 9-8-302(17). Limited subsurface testing may include isolated shovel tests but generally does not involve systematic exposure of bare ground.

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